

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
DOROTHY GREGORY COOKE)	Case No. 19-35184-KLP
)	Chapter 13
Debtor)	

MOTION TO SELL REAL ESTATE

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Sell Real Estate, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on October 2, 2019.

2. The Debtor and her son, Darnell Johnson, Jr. inherited the property known as 3215 Dorithian Road, Baltimore, MD 21215-7501, more particularly known as

BEING THE FIRST LOT IN A LEASE DATED NOVEMBER 18, 1948, RECORDED AMONG THE LAND RECORDS OF BALTIMORE CITY IN LIBER MLP 7636, FOLIO 377, FROM HENRY I. ADLER AND WIFE TO THE BEDFORD HOLDING COMPANY, IN WHICH THE PROPERTY WAS LEASED FOR THE ANNUAL GROUND RENT OF \$108.00, PAYABLE ON THE 18TH DAYS OF MAY AND NOVEMBER. THE GROUND RENT WAS ACQUIRED BY THE PARTY OF THE FIRST PART BY DEED DATED JANUARY 9, 1992, RECORDED AMONG SAID LAND RECORDS IN LIBER SEB 3077, FOLIO 327, FROM JULIUS LEVIN TO REUBEN FISHKIND AND MINDY FISHKIND, TRUSTEES FOR SCOTT JEREMY FISHKIND. MINDY FISHKIND IS THE SURVIVING TRUSTEE OF SAID TRUST. THE LEASEHOLD INTEREST WAS ACQUIRED BY DEED DATED JANUARY 21, 2006, RECORDED IN LIBER FMC 7628, FOLIO 688, FROM HAROLD FRANKLIN GREGORY AND ANN C. GREGORY TO THE GRANTEE(S) HEREIN.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

(the "Property").

3. The property is owned outright with no liens or encumbrances. The appraised value of the Property is \$58,000.00.

4. Debtor and co-owner have entered into a contract ("Contract") for the sale of the Property for \$58,000.00. A copy of said contract is attached hereto collectively as Exhibit "A" and incorporated herein by this reference.

5. Proceeds from the sale will be split fifty-fifty between Debtor and co-owner.

6. The amount of the sale to be applied to the debtor's obligations under the confirmed plan is \$14,000.00, which will not result in full payment of all allowed claims.

7. The approximate amount of sales proceeds to be paid to the Debtor is \$15,000.00.

8. The Debtor is requesting \$15,000.00 from her portion of the sales proceeds to purchase a vehicle, as she does not currently have a vehicle and has been asking friends and family for rides.

9. On March 20, 2021, or as soon thereafter as may be practicable, Debtor intends to sell her home interest in the Property in accordance with the terms of the contract.

WHEREFORE, the Debtor requests that the Court enter an Order authorizing the sale of the Property in accordance with the terms of the Contract and for such other relief as the Court may deem appropriate

Dated: March 3, 2021

DOROTHY GREGORY COOKE

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof, and I mailed a true and exact copy to the parties on the list attached hereto.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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NOTICE OF MOTION AND HEARING

The above Debtor has filed a Motion to Sell Real Estate with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **March 24, 2021 at 10:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: March 3, 2021

DOROTHY GREGORY COOKE

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
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/s/ James E. Kane
Counsel for Debtor

Label Matrix for local noticing

Toyota Motor Credit Corporation

United States Bankruptcy Court

0422-3

c/o Becket and Lee LLP

701 East Broad Street

Case 19-35184-KLP

PO Box 3002

Richmond, VA 23219-1888

Eastern District of Virginia

Malvern, PA 19355-0702

Richmond

Wed Mar 3 18:08:31 EST 2021

Ally Bank

Ally Financial

Ashley Funding Services, LLC

PO Box 130424

Attn: Bankruptcy Dept

Resurgent Capital Services

Roseville MN 55113-0004

Po Box 380901

PO Box 10587

Bloomington, MN 55438-0901

Greenville, SC 29603-0587

Bank of America, N.A.

Bayview Financial Loan

Capital One

P O Box 982284

Attn: Bankruptcy Dept

Attn: Bankruptcy

El Paso, TX 79998-2284

4425 Ponce De Leon Blvd. 5th Floor

Po Box 30285

Coral Gables, FL 33146-1873

Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.

Community Loan Servicing, LLC

Gerald Taylor

by American InfoSource as agent

4425 Ponce De Leon Blvd., 5th Floor

8500 Perrymont Road

4515 N Santa Fe Ave

Coral Gable, FL 33146-1873

Richmond, VA 23237-2817

Oklahoma City, OK 73118-7901

NetCredit

Samuel I. White

Todd M. Ritter, Esquire

175 W. Jackson Blvd., Suite 1000

5040 Corporate Woods Dr.

11901 Iron Bridge Road

Chicago, IL 60604-2863

Suite 120

Chester, VA 23831-1458

Virginia Beach, VA 23462-4377

(p)TOYOTA MOTOR CREDIT CORPORATION

Verizon

Verizon Wireless

PO BOX 8026

by American InfoSource as agent

Attn: Bankruptcy

CEDAR RAPIDS IA 52408-8026

4515 N Santa Fe Ave

500 Technology Dr, Ste 550

Oklahoma City, OK 73118-7901

Weldon Spring, MO 63304-2225

Wells Fargo Dealer Services

Carl M. Bates

Dorothy Gregory Cooke

Attn: Bankruptcy

341 Dial 866-813-0912 Code: 8576180

13330 Master Stag Drive

Po Box 19657

P. O. Box 1819

Midlothian, VA 23112-1970

Irvine, CA 92623-9657

Richmond, VA 23218-1819

James E. Kane

John P. Fitzgerald, III

Kane & Papa, PC

Office of the US Trustee - Region 4 -R

1313 East Cary Street

701 E. Broad Street, Ste. 4304

P.O. Box 508

Richmond, VA 23219-1849

Richmond, VA 23218-0508

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Toyota Financial Services

Atty: Bankruptcy Dept

Po Box 8026

Cedar Rapids, IA 52409-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Bayview Loan Servicing LLC

(u)Community Loan Servicing, LLC

(u)Community Loan Servicing, LLC f/k/a Bayvie

(d)Toyota Motor Credit Corporation
c/o Becket and Lee LLP
PO Box 3002
Malvern PA 19355-0702

End of Label Matrix
Mailable recipients 22
Bypassed recipients 4
Total 26